

REMARKS

All pending claims stand rejected under 35 U.S.C. § 103(a) as being unpatentable over various combination of U.S. patents of Heddaya, Smith, Ganguly, Eichstaedt, Reiche, Lapstun, Birnbaum, and Genty. Applicant respectfully submits that all the above cited references do not teach or suggest all the limitations of the rejected claims.

I. The cited passages of Ganguly do not cure the deficiencies of Heddaya and Smith.

The Office Action acknowledges that Heddaya and Smith fail to disclose the claimed limitation of “packaging the information associated with the data in a prescribed format” but cites to **col. 7, lines 27–55** of Ganguly and concludes that the cited lines disclose the aforementioned claimed limitations. Applicants agree that Heddaya and Smith do not disclose the above limitations, but Applicants respectfully disagree that Ganguly discloses the claimed limitations.

According to the specification as originally filed, the present invention takes the form of a method and system for prefabricating information, in which the necessary steps to retrieve and package information requested by a user are preemptively performed by the computer system before the user makes an explicit information request. Instead, an embodiment of the invention predictively identifies and prefabricates information that may be displayed to the user in the future. When the user later makes a request for information, the desired information can be immediately displayed to the user without the delays associated with contemporaneous retrieval and packaging of the information.

In one embodiment, if a valid, prefabricated HTTP response to the user requested URL is not available, then the URL request is dynamically processed by a Java servlet 316 to produce the desired HTTP response. The Java servlet 316 may access a database 312 to retrieve or process *information associated with the URL*. The HTTP response produced by the Java servlet 316 is routed to the browser 302 by the interceptor service module 304.

In another embodiment, the prefabrication policies indicate that both start pages as well as menu pages should be prefabricated. Thus, the URL collector 412 crawls through the HTTP response for each start page to attempt to identify URLs for additional menu pages. The *URLs* for the identified menu pages are *packaged as new PRBs* that are sent to the benefit analyzer.

The cited lines of Ganguly that are suppose to disclose “packaging the *information associated with the data* in a prescribed format.” However, **Col. 7, lines 27 – 55** of Ganguly is silent with packaging any information associated with the data as claimed. The cited lines states:

FIG. 3 is a functional diagram of the predicate proxy core 300 including a connection manager 302, a protocol handler 304, a cache manager 306, a query engine 308, and predicate logic 310. The connection manager 302 is responsible for maintaining proxy connections to the clients, as well as to the directory servers. Since LDAP/NDAP are connection-oriented protocols, the connection manager may function in accordance with a connection-oriented service, such as TCP. The protocol handler deals with LDAP/NDAP specific marshalling and un-marshalling of arguments to/from the network.

The cache manager 306 is responsible for management of the proxy cache, including managing cache entries. To that end, the cache manager interacts with the predicate logic, the query engine and the persistence subsystem to provide high-level “intelligence” when managing the cache entries. The query engine is responsible for computing total or partial results based on a cache entry and, thus, is generally similar to a search engine of a conventional LDAP/NDAP server. The predicate logic is the core of the directory proxy which implements the dynamic

caching technique by computing whether a subsequent query can be subsumed by the current cached results. Unlike a traditional caching system, the dynamic caching technique does not provide a unique one-to-one mapping between a query predicate and a result set.

Therefore, Ganguly discloses a predicate proxy core, but does not *package information associated with the data* as claimed. It is silent with respect to “packaging information associated with the data in a prescribed format”. Specifically, Ganguly does not disclose any information associated with any data that is packaged or rendered in order to prefabricate any pages. As such, Ganguly does not perform at least this claimed limitation. Thus, Ganguly does not cure the deficiencies of Heddaya and Smith and cannot be used to preclude the patentability of claim 1 and its dependent claims.

Claims 49, 58, and 63 disclose similar limitations as does claim 1. Claims 23, 70-71, and 73-74 represent the system and computer program product claims implementing the above method claims and thus are believed to be allowable over the cited references for at least the foregoing reasons. As such, Applicants respectfully submit that claims 1, 23, 49, 58, 70-71, 73-74, and their respective dependent claims are believed to be allowable over the cited references.

II. Eichstaedt, Reiche, Lapstun, Birnbaum, and Genty do not disclose, teach, or suggest the claimed limitations that both Heddaya and Smith fail to disclose.

As stated above, Heddaya and Smith in view of Ganguly fail to disclose the claimed limitations including “**packaging** the information associated with the data in a prescribed format”. Eichstaedt, Reiche, Lapstun, Birnbaum, and Genty are cited by the Office Action to show other limitations of the claims.

As such, Applicants respectfully submit that Eichstaedt, Reiche, Lapstun, Birnbaum, and Genty also do not teach or suggest “**packaging** the information associated with the data in a prescribed format” and thus fail to cure the deficiency of Heddaya, Smith and Ganguly. Therefore, claim 1 is again believed to be allowable over the cited references.

Claims 49, 58, and 63 disclose similar limitations as does claim 1. Claims 23, 70-71, and 73-74 represent the system and computer program product claims implementing the above method claims and thus are believed to be allowable over the cited references for at least the foregoing reasons. As such, Applicants respectfully submit that claims 1, 23, 49, 58, 70-71, 73-74, and their respective dependent claims are believed to be allowable over the cited references.

CONCLUSION

Based on the foregoing, all remaining claims are in condition for allowance, which is respectfully requested. If the Examiner has any questions or comments regarding this response, the Examiner is respectfully requested to contact the undersigned at the number listed below.

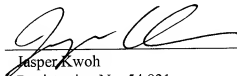
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Respectfully submitted,

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